

## Exhibit 1

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UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

JOHN DOE I, et al.,

v.

OFFICE OF THE DIRECTOR OF  
NATIONAL INTELLIGENCE, et al.,

Defendants.

Case No. 1:25-cv-00300

**DECLARATION OF JOHN L. RATCLIFFE, DIRECTOR  
CENTRAL INTELLIGENCE AGENCY**

I, JOHN L. RATCLIFFE, hereby declare and state:

1. I am the Director of the Central Intelligence Agency ("CIA" or "Agency"). I have held this position since 23 January 2025. I make the following statements based upon my personal knowledge and information provided to me in my official capacity.

2. Through the exercise of my official duties, I am familiar with the above-captioned lawsuit filed against the Office of the Director of National Intelligence, the Director of National Intelligence, the CIA, and me in my official capacity. I am aware that in connection with this proceeding, the Court has requested additional information regarding the basis for my decision to terminate the Agency employment of CIA employees who

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most recently served in the Agency's former Diversity and Inclusion Office ("DIO").

3. On 20 January 2025, President Donald Trump issued Executive Order 14151, entitled "Ending Radical and Wasteful Government DEI Programs and Preferencing." This Executive Order mandated the closure of all "diversity, equity, inclusion, and accessibility (DEIA)" programs in the Federal Government, to include the Agency's former DIO. On 24 January 2025, the U.S. Office of Personnel Management ("OPM") issued a Memorandum, entitled "Guidance Regarding RIFs of DEIA Offices," which required federal agencies to execute a reduction-in-force ("RIF") action with respect to employees who had most recently worked in their respective DEIA offices. The OPM Memorandum required that the "competitive area" for such a RIF be defined "solely in terms of the DEIA office where the employees [had] worked." I understood that these directives, in combination, effectively prescribed terminating the employment of these employees.

4. I therefore determined that in order to best effectuate the directives in Executive Order 14151 and the 24 January 2025 OPM Memorandum with respect to CIA, I would exercise my authority under Section 104A(e)(1) of the National Security Act of 1947 (50 U.S.C. § 3036(e)(1), as amended) and Section II.D of

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Agency Regulation 4-16 ("Termination Without Procedures") to terminate the Agency employment of those employees who had most recently served in the Agency's former DIO, or permit their retirement or resignation in lieu of termination (if eligible). These provisions authorize me to terminate the employment of any Agency employee when, in my discretion, I deem it "necessary or advisable in the interests of the United States."

5. I memorialized my decision in an 18 February 2025 Memorandum ("Decision to Terminate the Employment of Employees in the Former Diversity and Inclusion Office"), which I understand has since been introduced in this litigation. As I noted in that Memorandum, I determined that it was "necessary or advisable in the interests of the United States to terminate all of the employees of the former DIO." It was my intent then, and remains my intent now, that any such terminations should be effected under Section 104A(e)(1) of the National Security Act of 1947 and Section II.D of Agency Regulation 4-16.

\* \* \*

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I hereby declare under penalty of perjury that the foregoing is true and correct.

(U) Executed this 25<sup>th</sup> day of February, 2025.

A handwritten signature in black ink, appearing to read "John D. Ratcliffe", written over a horizontal line.

John D. Ratcliffe  
Director  
Central Intelligence Agency

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